

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 JUN 27 AM 10:56

Judy Gayle Ferrell

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Neil Harris (owner)
Prestigious Carrier Inc

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Judy Gayle Ferrell
(name of plaintiff)

is a citizen of the United States and resides at 3358 Kirby Trees Place
859 Wingfield
(street address)

Memphis US TN
(city) (country) (state)

38122 3815 (901) 270-6125
(zip code) (telephone number)

3. Defendant Nell Harris (Prestigious Carriers, Inc.)
(defendant's name)
 lives at, or its business is located at 2117 Hillshire Circle - Suite 102
Memphis TN 38133
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
2117 Hillshire Circle Suite 102
Memphis US TN 38133
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 09 20 2011
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 04 20 2013
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 04 09 2013. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ____ race, (2) ____ color, (3) ____ sex, (4) ____ religion, (5) ____ national origin, defendant

(a) ____ failed to employ plaintiff.

(b) ____ terminated plaintiff's employment.

(c) ____ failed to promote plaintiff.

(d) sex and retaliation

10. The circumstances under which defendant discriminated against plaintiff were as follows: I was sexual harassed by Gearra Harris.
The Prestigious Carrier Inc wanted to put a
600K Life Insurance policy on me. Paying
to Prestigious Carrier Inc. Net deducted my
pay down to bring home \$450.00 and I am
still salaried same title. I was promised
full insurance and life insurance & pension but
received nothing. I am being bullied and
threatened by ~~Gearra Harris~~ of employment.
~~AND~~ Since this has happened I have been forced to
reapply for bankruptcy and struggling to pay my bills.

11. The acts set forth in paragraph 9 of this complaint

- (a) ___ are still being committed by defendant.
(b) ___ are no longer being committed by defendant.
(c) X may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ___ Defendant be directed to employ plaintiff, or
(b) ___ Defendant be directed to re-employ plaintiff, or
(c) ___ Defendant be directed to promote plaintiff, or;
(d) ✓ Defendant be directed to pay 2011 taxes, pay
deducted wages 02/20/2013 till present
pain & suffering due to bullying & stress.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ✓ No ()

J. S. Ornel
SIGNATURE OF PLAINTIFF